

SEP 27 2021

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA

v.

KENAN LISTER

No..

3:21-00216

18 U.S.C. § 242

18 U.S.C. § 1519

DT  
DEPUTY CLERK

INDICTMENT

THE GRAND JURY CHARGES:

At all times material to this Indictment:

Introduction

1. The Trousdale Turner Correctional Center (hereinafter "Trousdale") is a private prison that contracts with the state of Tennessee to house state inmates. Trousdale is located in Hartsville, Tennessee, in the Middle District of Tennessee.

2. On or about August 30, 2019, R.V. was an inmate who was housed at Trousdale.

3. On or about August 30, 2019, **KENAN LISTER** was a supervisory corrections officer who served as Trousdale's Security Threat Group Coordinator.

4. Paragraphs 1 through 3 are hereby incorporated by reference into the Counts set forth below.

COUNT ONE

On or about August 30, 2019, in the Middle District of Tennessee, **KENAN LISTER**, while acting under color of law, willfully deprived R.V., a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from cruel and unusual punishment. Specifically, while R.V. was sitting in a holding cell and not resisting, **KENAN LISTER** punched R.V. in the head, knocking him to the ground, then kicked, punched,

and struck R.V. multiple times in R.V.'s head, chest, and torso after R.V. was on the ground. The offense resulted in bodily injury to R.V.

All in violation of Title 18, United States Code, Section 242.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

On or about August 30, 2019, in the Middle District of Tennessee, **KENAN LISTER**, while acting under color of law, willfully deprived R.V., a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from cruel and unusual punishment, which includes a prisoner's right to be free from an officer's deliberate indifference to his serious medical needs. Specifically, **KENAN LISTER** knew R.V. had serious medical needs after **KENAN LISTER** had kicked, punched, and struck R.V. multiple times in the head, chest, and torso, and willfully failed to provide medical care and to make the notifications necessary for R.V. to receive medical care, thereby acting with deliberate indifference to a substantial risk of harm to R.V.

All in violation of Title 18, United States Code, Section 242.

COUNT THREE


THE GRAND JURY FURTHER CHARGES:

On or about August 30, 2019, in the Middle District of Tennessee, **KENAN LISTER**, in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly falsified a document with the intent to impede, obstruct, and influence the investigation and proper administration of the matter within the jurisdiction of a federal agency. Specifically, **KENAN LISTER** falsified a Trousdale Incident

Statement dated August 30, 2019, for a use of force incident involving inmate R.V. by omitting the material information that **KENAN LISTER** punched, kicked, and struck R.V. multiple times.

All in violation of Title 18, United States Code, Section 1519.

A TRUE BILL:

  
GRAND JURY FOREPERSON

MARY JANE STEWART  
ACTING UNITED STATES ATTORNEY

  
SARA BETH MYERS

ASSISTANT UNITED STATES ATTORNEY

  
MICHAEL J. SONGER

TRIAL ATTORNEY  
CIVIL RIGHTS DIVISION